

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

**CONSENT MOTION FOR ENTRY OF A PROTECTIVE ORDER
GOVERNING DISCLOSURE OF PROTECTED
IDENTITY, FINANCIAL, CONTACT, HEALTH AND TAX INFORMATION**

Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, United States hereby moves for entry by this Court of a protective order that will ensure the confidentiality of Protected Identity, Financial, Contact, Health and Tax Information (collectively, “Protected Information”) which is or may be included within the government’s evidence in this case.

Entry of a protective order restricting the use, dissemination and disposition of documents containing Protected Information is essential to permit the United States to provide extensive discovery to the Defendant while protecting the Protected Information of the victims of identity theft in this case. While defense counsel have been offered or given access to these materials, the voluminous nature of discovery in this case weighs heavily in favor of providing counsel with copies of all documents.

The United States and counsel for the Defendant conferred regarding a draft protective order proposed by the United States (the “Government’s Proposed Protective Order”) and have reached an agreement with respect to all of the provisions contained therein.

A copy of the Proposed Protective Order bearing the signatures of counsel to the United States and Defendant is submitted herewith.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

s/ Tracy Lynn Berry
TRACY LYNN BERRY #014753
Assistant United States Attorney
111 South 10th Street, Room 20.333
St. Louis, Missouri 63102
(314) 539-2200

CERTIFICATE OF SERVICE

Copy of the foregoing was sent through the court's electronic filing system this 30th day of September, 2020, to: Terence Niehoff, Esq.

s/ Tracy Lynn Berry
ASSISTANT UNITED STATES ATTORNEY